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*Attorneys for Defendant LG Electronics USA, Inc.*

UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

United Services Automobile  
Association a/s/o Sgt. Sean Stoddard,  
  
Plaintiff,

v.

LG Electronics USA, Inc.,  
  
Defendant.

No.

**NOTICE OF REMOVAL**

Defendant LG Electronics USA, Inc., (“Defendant”, “LG USA”, or “LG”) gives notice of its removal of this action from the Pinal County Superior Court to the United States District Court for the District of Arizona. This Court has diversity jurisdiction pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, and LRCiv 3.6. In support of this removal, Defendant provides the following information.

**1. Background.**

Plaintiff United Services Automobile Association (“USAA”) a/s/o Sgt. Sean Stoddard filed the Complaint against Defendant in the Pinal County Superior Court. It was assigned case number S1100CV202501685.



1 Plaintiff's Complaint alleges that the Defendant is strictly liable and negligent for  
2 the design, manufacture, and sale of a washing machine that allegedly caused flooding on  
3 the lower level of the insured's property. (*See generally* Ex. A, Complaint.)

4 Plaintiff seeks \$134,708.61 in property and other damages, and attorneys' fees and  
5 costs pursuant to A.R.S. § 12-341. (Ex. A, Complaint.) As discussed in section 30 below,  
6 this exceeds the required minimum threshold amount to remove a case to federal court.

7 As discussed in section 0 below, the removal is timely. LG USA's statutorily  
8 designated agent for service of process, the Corporation Service Company, received  
9 service of process on June 12, 2025. (Ex. B, Service Documents.)

10 LG USA has not filed an Answer or otherwise responded to Plaintiff's Complaint.

11 **2. This Removal Is Timely.**

12 This removal has been filed within 30 days of service. For purposes of removal,  
13 LG USA's designated agent for service of process was served on June 12, 2025. (Ex. B,  
14 Service Documents.) *Anderson v. State Farm Mut. Auto. Ins. Co.*, 917 F.3d 1126, 1130  
15 (9th Cir. 2019) ("The thirty-day removal clock under 28 U.S.C. § 1446(b)(1) does not  
16 begin upon service on and receipt by a statutorily designated agent," it begins when the  
17 defendant actually received the complaint from its statutory agent.).

18 Thus, this removal is timely under 28 U.S.C. § 1446(b) because it is being filed  
19 within 30 days from the date on which LG USA received the Complaint.

20 **3. This Court Has Diversity Jurisdiction.**

21 Diversity jurisdiction exists where: (1) the suit is between citizens of different  
22 states; and (2) the amount in controversy exceeds \$75,000, exclusive of interest and costs.  
23 *Lee v. Am. Nat'l Ins. Co.*, 260 F.3d 997, 1004 (9th Cir. 2001). These requirements are met.

24 **A. There is Complete Diversity of Citizenship Between All Parties.**

25 For purposes of diversity jurisdiction, a corporation is deemed to be a citizen of  
26 every state where it has been incorporated and where it has its principal place of business.



28 U.S.C. § 1332(c); *Hertz Corp. v. Friend*, 559 U.S. 77, 80-81 (2010) (“[P]rincipal place of business’ refers to the place where the corporation’s high level officers direct, control, and coordinate the corporation’s activities.”). There is complete diversity between Plaintiff and Defendant.

***i. USAA is a Citizen of Texas.***

USAA was incorporated in and has its principal place of business in Texas.<sup>1</sup>

***ii. Sgt. Sean Stoddard is a Citizen of Arizona***

First Sergeant Sean Stoddard is an USAA insured. According to the Complaint, he resides in Florence, Arizona. He is an Arizona citizen.

***iii. LG USA is a Citizen of Delaware and New Jersey.***

LG is incorporated in Delaware and has its principal place of business in New Jersey.

**B. The Amount In Controversy Exceeds \$75,000.**

Where there is diversity of citizenship, the “district courts shall have original jurisdiction of all civil actions where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.” 28 U.S.C. § 1332(a).

The amount in controversy exceeds \$75,000. Plaintiff seeks \$134,708.61 in monetary damages, excluding claims for interest, attorneys’ fees, and costs. (Ex. A, Complaint ¶ 16.) This amount exceeds the jurisdictional limit.

**4. Defendant Has Met all Other Requirements for Removal.**

**A. Copy of State Court Record Attached.**

Pursuant to LRCiv 3.6(b), a copy of each of the following documents is separately attached and filed herewith: (1) Supplemental Civil Cover Sheet; (2) the most recent state-court docket; (3) the Complaint; (4) service documents; and (5) verification of the

<sup>1</sup> Plaintiff alleges that it was an insurance carrier operating in Arizona at all relevant times. (See Ex. A, Complaint ¶ 1.)



1 removing party or its counsel that true and correct copies of all pleadings and other  
2 documents filed in the state court proceedings have been filed. (*See* Ex. C, Cobb  
3 Declaration.)

4 **B. Defendant Has Noticed Maricopa County Superior Court Clerk and**  
5 **Plaintiff.**

6 Defendant is filing a copy of this Notice of Removal with the Clerk of the  
7 Maricopa County Superior Court today pursuant to 28 U.S.C. §1446(d) and LRCiv 3.6(a).  
8 Defendant is also providing Plaintiff with written notice of the filing of this Notice of  
9 Removal today through its counsel.

10 **5. This Court Should Accept Removal.**

11 Defendant respectfully requests the Court accept this Notice of Removal, assume  
12 jurisdiction of this case, and issue such further orders and processes which may be  
13 required to bring before it all parties necessary for the disposition of the same.

14 DATED this 11th day of July, 2025.

15 WOMBLE BOND DICKINSON (US) LLP

16 By: /s/ Stephen M. Bressler

17 Stephen M. Bressler

18 Adam T. Reich

19 Kendra L. Cobb

20 *Attorneys for Defendant LG Electronics*  
21 *USA, Inc.*



**CERTIFICATE OF SERVICE**

I hereby certify that on 11th day of July, 2025, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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